

NPDES  
FORM  
3510-6UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460  
NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED  
WITH  
INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PER  
MITFORM  
Approved OMB No.  
2040-0004

## Permit Information

The data in this form was migrated and may not reflect all data previously entered by the permittee.

Master Permit Number: MAR050000NPDES ID: MAR053576

## Eligibility Information

State/territory where your facility is located: MAIs your facility located on Federally Recognized Indian Country Lands? NoAre you a "Federal Operator" as defined in Appendix A ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixa.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf))?NoWhich type of form would you like to submit? Notice of Intent (NOI)

By indicating "Yes", I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit.

YesAre you a new discharger or a new source as defined in Appendix A ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixa.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf))?No➤ Have stormwater discharges from your facility been covered previously under an NPDES permit? Yes

➤ Most current NPDES ID (i.e., permit tracking number) if you had coverage under EPA's MSGP 2008 or the NPDES permit number if you had coverage under an EPA individual permit:

MAR05EA33➤ Are you discharging to any waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource water)? (See Appendix L ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixl.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixl.pdf)))NoDoes your facility discharge to a federal CERCLA site listed in Appendix P ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixp.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixp.pdf))?No

## Operator Information

## Operator Information

Operator Name: Joseph Freedman Co

Operator Mailing Address

Address Line 1: 115 Stevens Street

Address Line 2:

City: Springfield

ZIP/Postal Code: 01104

State: MA

County or Similar Division:

Operator Point of Contact Information

First Name Middle Initial Last Name: Michael . Jones

Organization:

Title: Maintenance Supervisor

Phone: 4137814444 Ext.:

Email:

Facility Information

Facility Information

Facility Name: THE JOSEPH FREEDMAN COMPANY, INC.

Facility Address

Address Line 1: 115 STEVENS STREET

Address Line 2:

City: SPRINGFIELD

ZIP/Postal Code: 01104

State: MA

County or Similar Division: Hampden

Latitude/Longitude for the Facility

Latitude/Longitude: 42.137335°N, 72.557235°W

Latitude/Longitude Data Source: Horizontal Reference Datum: NAD 83

What is the ownership type of the facility? Privately Owned Facility

Estimated area of industrial activity at your facility exposed to stormwater (rounded to the nearest quarter acre): 2

Sector-Specific Information

Primary Sector: N Primary Subsector: N1

Primary SIC Code: 5093

Additional Sectors

Sector: N Subsector: N2

Is your facility presently inactive and unstaffed? No

Discharge Information

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the allowable stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.1.3. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.1.2 and 1.1.3 will be discharged, they must be covered under another NPDES permit.

Yes

Federal Effluent Limitation Guidelines

Identify the Effluent Limitation Guideline(s) that apply to your stormwater discharges.

There are no guidelines associated with the sector(s) selected in the Facility Information section above.

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? No

Benchmark Monitoring

Are you subject to benchmark monitoring requirements for a hardness-dependent metal? Yes

➤ Does your facility discharge into any saltwater receiving waters? No

➤ What is the hardness of your receiving water(s)? 12.5

Other Discharge Information

Does your facility discharge into a Municipal Separate Sewer System (MS4)? Yes

➤ If yes, provide the name of the MS4 operator: Springfield Water and Sewer Commission

Receiving Waters Information

List all of the stormwater outfalls from your facility.

Outfall 001:

Applicable Sectors

Select the Sectors/Subsector(s) that apply to this outfall.

	Sector	Subsector
<input checked="" type="checkbox"/>	N - SCRAP RECYCLING FACILITIES	N2 - Source-separated Recycling Facility
<input checked="" type="checkbox"/>	N - SCRAP RECYCLING FACILITIES	N1 - Scrap Recycling and Waste Recycling Facilities except Source-Separated

Latitude/Longitude: 42.137335°N, 72.557235°W

☐ This outfall is *Substantially Identical* to an existing outfall.

Receiving Water

GNIS Name:  
n/a

Waterbody Name:  
UNNAMED TRIBUTARY - Locally known as  
Poor Brook

Listed Water ID:  
n/a

Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water)?

No

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? Yes

Cause of Impairment Group	Pollutant
PATHOGENS	E. coli

Has a TMDL been completed for this receiving waterbody? No

Outfall 002:

Applicable Sectors

Select the Sectors/Subsector(s) that apply to this outfall.

	Sector	Subsector
<input checked="" type="checkbox"/>	N - SCRAP RECYCLING FACILITIES	N2 - Source-separated Recycling Facility
<input checked="" type="checkbox"/>	N - SCRAP RECYCLING FACILITIES	N1 - Scrap Recycling and Waste Recycling Facilities except Source-Separated

Latitude/Longitude: 42.137795°N, 72.556795°W

☒ This outfall is *Substantially Identical* to an existing outfall.

➤ Substantially Identical to Outfall ID: 001

Receiving Water

GNIS Name:  
n/a

Waterbody Name:  
UNNAMED TRIBUTARY - Locally known as  
Poor Brook

Listed Water ID:  
n/a

Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water)?

No

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? Yes

Has a TMDL been completed for this receiving waterbody? No

SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI, as required? Yes

SWPPP Contact Information:

First Name Middle Initial Last Name: Michael . Jones

Organization:

Professional Title: Maintenance Supervisor

Phone: 4137814444

Ext.:

Email: drg@jfreecycle.com

**SWPPP Availability:**

Your current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information:

**Note:** you are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixa.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixa.pdf))) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.

☐ Option 1: Maintain a Current Copy of your SWPPP on an Internet Page (Universal Resource Locator or URL).

☒ Option 2: Provide the following information from your SWPPP:

**A. Describe your onsite industrial activities exposed to stormwater and potential spill and leak areas.**

e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams

The Joseph Freedman Company, Inc. operates a premium scrap metal recovery and recycling facility at the Site. The company recycles aluminum, ferrous, and non-ferrous metals at the Stevens Street facility. Scrap metals are transported to the site in trucks, some of which are owned by Freedman. Scrap metals are unloaded both inside and on the outside of the processing building. Material handling equipment such as front-end loaders is used to transfer raw materials and finished products around the site. Processing of the scrap material occurs only inside the processing building and is not exposed to precipitation. Stockpiles of certain higher-volume metals, such as light iron and aluminum, are stored outside. Certain work areas within on-site buildings are ventilated to the outside air, with dust collection systems in place. Ancillary activities include equipment servicing and repair, which is conducted in an indoor garage area and thus not exposed to stormwater. Portions of the Site discharge stormwater to two outfalls (Outfalls 1 and 2) that in turn discharge to a storm sewer located in Stevens Street. The ultimate discharge point of this flow is to surface water at the Poor Brook. Outfalls 1 and 2 each receive flow from surface runoff and roof drains on separate parts of the Site. Stormwater on the eastern third of the Site is not discharged but infiltrates on-site.

**B. List the pollutants(s) or pollutant constituent(s) associated with each industrial activity exposed to stormwater that could be discharged in stormwater and/or in any authorized non-stormwater discharges listed in Part 1.1.3.**

Loading and unloading of scrap metal materials - Metal fines and other particulates, oil, and grease  
 Stockpiling and storage of scrap metal materials - Metal fines and other particulates, oil, and grease  
 Material Handling -- Metal fines and other particulates, oil, and grease  
 Vehicle Maintenance Vehicle fuel and fluids - Conducted in covered garage  
 Vehicle Washing/Cleaning -- Petroleum residues, metal fines and other particulates - This activity is conducted in area where runoff does not occur

**C. Describe the control measures you will employ to comply with the non-numeric technology-based effluent limits required in Part 2.1.2 and Part 8, and any other measures taken to comply with the requirements in Part 2.2 Water Quality-Based Effluent Limitations (see Part 5.2.4).**

Minimize Exposure. Material handling equipment is stored inside buildings during off-hours. Vehicle and equipment maintenance is conducted in covered garage. Scrap metal processing will be conducted inside a building. Good Housekeeping. Periodic sweeping of paved section of yard area to control dirt and metal fines in run-off. Immediate clean-up of incidental, minor spills. Areas around material storage are kept clean and picked-up. Storage of scrap metal materials in designated areas only. Maintenance. Material handling equipment (trucks, forklifts, front-end loaders) is maintained in good working order to prevent drips of oil, grease, and fuel. Material processing will be conducted within the designated buildings. Catch basins at the Site are inspected on a regular basis. These basins are fitted with filter fabric bags or other filtration media, which are cleaned or replaced as needed in order to maintain performance. Spill Prevention and Response. The facility has a Spill Prevention, Control, and Countermeasure (SPCC) Plan for oil, which includes spill response procedures and emergency contacts. Oils and hazardous materials are stored in secured, designated areas, such as fuel storage tanks or storage lockers in the vehicle maintenance shop. Spill containment kits are located in designated places around the facility. Site staff is trained in spill containment and notification procedures. Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302 occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. Contact information must be in locations that are readily accessible and available. MassDEP release notification requirements also apply to releases of greater than a reportable quantity of oil or hazardous material within a 24-hour period. The contact number for MassDEP is 1-888-304-1133. Erosion and Sediment Controls. The drainage area that discharges to Outfall 1 consists of a paved yard area or building footprints. Erosion and sedimentation are not primary concerns, but catch basins in this area are equipped with filter traps in order to control particulates from metal fines and soil tracked onto the paved areas by vehicles and equipment. Management of Runoff. Given the configuration and use of the Site, the diversion, infiltration, or reuse of stormwater are not viable options. Salt Storage Piles or Piles Containing Salt. Bulk salt is not stored on the Site. Dust Generation and Vehicle Tracking of Industrial Materials. The yard areas are formally inspected quarterly, but are generally observed on a daily basis for the accumulation of dirt brought in by transport vehicles. Yard sweeping is implemented as needed to control against excessive dust or metal fines on site yards and roadways.

**D. Provide a schedule for good housekeeping and maintenance (see Part 5.2.5.1) and a schedule for all inspections required in Part 4 (see Part 5.2.5.2).**

Waste materials are collected in designated areas and are removed from the facility on an as-needed basis. The facility's primary waste stream is non-metallic debris removed from received scrap, which is managed as a solid waste. The yard is swept to recover sand and other particulates on a regular but as-needed basis. Scrap metal materials are stored and processed indoors to the extent feasible. Site control measures are periodically inspected in accordance with MSGP permit requirements for routine facility inspections and repaired on an as-needed basis. Catch basins will be cleaned on an as-needed basis once sediment has accumulated to one half the depth between the bottom of the structure and the invert outlet.

## Endangered Species Protection

Using the instructions in Appendix E ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendix-2.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendix-2.pdf)) of the MSGP, under which endangered species criterion listed in Part 1.1.4.5 are you eligible for coverage under this permit?

Criterion A - No listed species of critical habitat are in the action area

Provide a brief summary of the basis for the criterion selected in Appendix E ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendix-2.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendix-2.pdf)):

e.g. communication with U.S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; Implementation of controls approved by EPA and the Services.

## Historic Preservation

If your facility is not located on Indian country lands, is your facility located on a property of religious or cultural significance to an Indian tribe?

Using the instructions in Appendix F ([https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015\\_appendixf.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_appendixf.pdf)) of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit?

Criterion B - Subsurface stormwater controls will not affect historic properties

## Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

**Certified By:** Vern Jones

**Certifier Title:** Maintenance Manager

**Certifier Email:**

**Certified On:** 09/15/2015 1:00 AM ET